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1	MICHAEL D. LONG (CA State Bar #149475)		
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4	Mike.Long.Law@msn.com		
5	Attorney for ADAN NAVARRO		
6	IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF CALIFORNIA		
7 8	THE UNITED STATES OF AMERICA, Plaintiff,) No. 2:21-191 KJM	
9 10	v.) STIPULATION AND [PROPOSED]) ORDER TO AMEND ADAN NAVARRO'S) CONDITIONS OF RELEASE	
11	ADAN NAVARRO,)) Date:	
12	Defendant.) Time:) Judge: Hon. Magistrate Allison Claire	
13		=)	
14	Adan Navarro's special conditions of pre-trial release are found in ECF document 23. The		
15	parties agree it is appropriate to modify Special Condition 16 to read:		
16			
17	"16. CURFEW: You must remain inside your residence every day from 11:00pm to 5:00am, or as		
18	adjusted by the pretrial services officer for medical, religious services, employment or court-		
19	ordered obligations."		
20	IT IS HEREBY STIPULATED AND AGREED between the defendant Adan Navarro, by		
21	and through her undersigned defense counsel, and the United States of America, by and through		
22	its counsel, Assistant U.S. Attorney David Spencer, that Special Condition 16 should be modified		
23	The counter, Assistant C.S. Attorney David Spencer, that Special Condition to should be modified		
24	as written in the previous paragraph.		
25	I have spoken to PTS Rene Basurto. She does not oppose this modification of Specia		
26	Condition 16. The newly Amended Condition is attached to this document.		
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28			

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1	Dated: July 15, 2022	Respectfully submitted,
2		/s/ Michael D. Long
3		MICHAEL D. LONG Attorney for Adan Navarro
4		Attorney for Adam Navano
5	Dated: July 15, 2022	PHIL TALBERT
6	·	United States Attorney
7		/s/ David Spencer
8		DAVID SPENCER Assistant U.S. Attorney
9		
10	[DDODOCED]	ODDED
11	[PROPOSED]	
12	GOOD CAUSE APPEARING AND HAVING BEEN SHOWN, IT IS SO ORDERED.	
13	The Court hereby orders Special Condition 16, to read as follows:	
14	"16. CURFEW: You must remain inside your residence every day from 11:00pm to 5:00am, or as	
15	adjusted by the pretrial services officer for medical, religious services, employment or court	
16	ordered obligations."	, , , , , , , , , , , , , , , , , , , ,
17	_	
18	Dated: July 15, 2022	auson Clane
19		ALLISON CLAIRE UNITED STATES MAGISTRATE JUDGE
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